

hhechtkopf@hnrklaw.com


April 10, 2023

By April 13, 2023, Plaintiff shall file a letter stating his position on Defendants' application.

**VIA ECF**

Hon. Jennifer H. Reardon  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, New York 10007

SO ORDERED.

  
Jennifer H. Reardon, U.S.D.J.  
Date: April 11, 2023

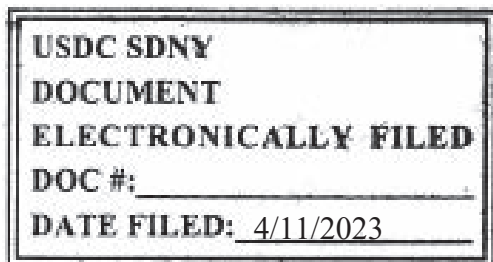
Re: *Steven Rosati v. Long Island Rail Road Co., et al.*, No. 21-CV-08594)

Dear Judge Reardon,


We represent defendants Metropolitan Transportation Authority, Long Island Rail Road Company, and Patrick J. Foye (collectively, "Defendants"). We write to provide a status update to the Court. We believe that counsel for the Plaintiff would agree to this update, but they have not responded to our emails today to provide the Court with a joint status update.

In the time since the parties' last update to the Court, new counsel has appeared for the Defendants (on March 14, 2023).

On March 15, 2023, the parties agreed that they would seek an additional 90 days to complete fact discovery (to June 26, 2023), because there are five outstanding depositions remaining to be taken, including high-level MTA/LIRR officials. Counsel for the Plaintiff had stated that they would request the additional time, but did not submit a letter to the Court. We therefore respectfully request that the Court allow the parties this additional time to complete discovery.



Respectfully submitted,

  
Helene R. Hechtkopf

cc: **VIA ECF**  
*All Counsel of Record*